



Muriel Goode-Trufant
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THE CITY OF NEW YORK
LAW DEPARTMENT
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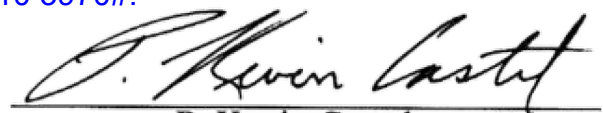
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December 11, 2024

Time to answer extended to January 13, 2025. The initial pretrial conference which was moved to January 13, 2025 is adjourned to February 7, 2025 at 10:30 a.m. Call-In: 1-855-244-8681; Access Code: 2305 810 3970#.
SO ORDERED.
Dated: 12/16/2024

BY ECF

Judge P. Kevin Castel
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007


P. Kevin Castel
United States District Judge

Re: Bryan Scott v. The City of New York, et. al.,
24-CV-04894 (PKC)

Your Honor:

I represent defendant the City of New York (the "City" in the above-referenced matter. In that capacity, I write with the consent of plaintiff's counsel, Brett Harris Klein, Esq., to respectfully request (1) a thirty-one day enlargement of time from December 13, 2024 to and including January 13, 2025, within which defendant City may answer or otherwise respond to the complaint; and (2) a corresponding adjournment of the Initial Conference scheduled for January 6, 2025. This is the first request for an enlargement of time and adjournment of the Initial Conference.

An enlargement of time is necessary for multiple reasons. An enlargement of time will allow this Office time to receive necessary records from the appropriate agencies. In order to respond to the allegations contained in the complaint, defendant City must obtain records of the underlying criminal case including police documents and documents from the Criminal Court and District Attorney's files. It is our understanding that these records are sealed pursuant to New York Criminal Procedure Law § 160.50. defendant City has received some, but not all, of the requested documents, and without the records, defendant City cannot properly assess this case or respond to the complaint. Accordingly, defendant City requires this enlargement so that this Office may obtain the underlying documentation, properly investigate the allegations of the complaint and fulfill our obligations under Rule 11 of the Federal Rules of Civil Procedure.

In view of the foregoing, defendant City respectfully requests a thirty-one day extension of time to respond to the complaint, from December 13, 2024 to and including January 13, 2025. Additionally, defendant City requests a corresponding adjournment of the Initial Conference scheduled for January 6, 2025. The parties have conferred and propose, with the Court's schedule allowing: February 3, 2025, February 5, 2025 through February 7, 2025, and February 12, 2025 at any time.

Thank you for your consideration herein.

Respectfully submitted,

/s/ *Yini Zhang*

Yini Zhang
Senior Counsel
Special Federal Litigation Division

cc: Brett Harris Klein, Esq. (By ECF)
Attorney for Plaintiff